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**Sent:** 11/15/2018 1:16:20 AM  
**To:** LEE, LILY [LEE.LILY@EPA.GOV]  
**Subject:** Dust control - evaluation of protectiveness

Dear Derek,

The public has expressed concern about potential health effects from radiological contamination in dust that could be generated during testing and cleanup. The Navy anticipates doing excavation, scanning at RSY pads, and other activities that could be associated with dust generation in locations that are potentially radiologically impacted. Please evaluate potential health impacts to residents, tenants, and workers from these activities and ensure that appropriate air quality monitoring is conducted during these activities. In the past, the Navy has stated that it applied the 2010 Basewide Dust Control Plan and/or other project specific dust control plans and monitoring SOPs to its work. We believe that the basewide Dust Control Plan and Radiological Management Plan and CERCLA (short-term protectiveness requirements and compliance with ARARs) require the Navy to conduct regular ambient air monitoring during remedial activities.

Specific language related to dust in the 2010 Basewide Dust Control Plan includes:

#### Section 1.1 DUST CONTROL PLAN FOR TIME CRITICAL REMOVAL ACTIONS

This plan was developed to ensure that the Department of the Navy (DON) maintains a coordinated approach for dust control and air monitoring activities across multiple contracts. At a minimum, all contractors will be required to adhere to the requirements set forth in this document. . . Contractors may be required to submit addenda to address work activities not presented in this plan.

#### Section 5.0 AIR MONITORING

Air monitoring is performed to ensure worker and community safety in accordance with NIOSH approved air sampling methodology. Figure 5-1 presents a map of known sensitive community receptors within 1 mile of HPS. Three types of air monitoring are conducted during construction activities:

- Air quality monitoring (total suspended particulates [TSP], manganese, lead, particulate matter smaller than 10 microns in diameter [PM10], and asbestos)
- Radionuclides of concern (ROCs) air monitoring
- Personnel monitoring

#### Section 5.2 AIR SAMPLING FOR RADIONUCLIDES OF CONCERN

As specified in the Base-wide Radiological Work Plan (TtEC 2007), airborne radioactivity monitoring (continuous or grab samples) will be conducted during the course of work. To control occupational exposures, establish personal protective equipment, and determine respiratory protection requirements, monitoring and trending for airborne radioactive material will be performed as necessary. Each ROC, as specified in 10 CFR 20, Appendix B, has a derived airborne concentration (DAC) value. DAC is defined as the concentration in air that will result in an intake of 1 annual limit (ALI) if breathed for a working year under high working conditions (inhalation rate of 1.2 cubic meters of air per hour). ALI is the derived limit for the quantity of radioactive material intake into the body of a worker by inhalation or ingestion in a year.

Engineered controls will be developed in conjunction with the Radiological Affairs Support Office. They will be implemented if required to maintain airborne concentrations below

10 percent of the applicable DAC value for the ROCs at the sites. Table 5-2 shows the ROCs and their respective DAC values.

The 2015 Basewide Radiological Management Plan says the following about air sampling:

#### 7.10 AIR SAMPLING

As specified in the RWP, airborne activity monitoring (continuous or grab samples) and engineering controls will be necessary during the course of work. To control occupational exposures, establish PPE, and determine respiratory protection requirements, monitoring and trending for airborne radioactive material will be performed as necessary. Engineered controls will be implemented if required to maintain airborne concentrations below 10 percent of the applicable derived air concentration (DAC) value for the radionuclides of concern (Table 7-2). If, during the course of work, airborne concentration exceeds 10 percent of the DAC, ongoing activities will cease and the affected location will be posted until the source of the airborne concentration is eliminated and levels are confirmed to be below 10 percent of the DAC. Air monitoring will be performed using the methods described in SOP-009, Air Sampling and Sample Analysis.

While we understand and share your concern regarding radiation worker protection, air quality monitoring needs to be conducted in a way that accurately characterizes not only their exposure, but also the exposure of nearby non-radiation workers, residents of Parcel A, and residents of the larger Bayview Hunters Point community. EPA has already recommended in the Five Year Review process currently underway that the Navy update its evaluation of protectiveness of radiological cleanup goals using, for example, the current version of the EPA PRG Calculators, where appropriate. Similarly, before field work proceeds related to the retesting of background locations and Parcel G, EPA recommends that the Navy should update its evaluation of the protectiveness of dust control plans related to radiological work at the entire Hunters Point Naval Shipyard. These steps are necessary to ensure short term protectiveness of the site for residents, tenants, and workers.

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